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8
9 UNITED STATES BANKRUPTCY COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 In re
13 PG&E CORPORATION
14 and
15 PACIFIC GAS AND ELECTRIC
COMPANY
16 Debtors.

Case No. 19-30088 DM (Lead Case)

(Jointly Administered with Case No.
19-30089 DM)

Chapter 11

**ARB, INC.'S NOTICE OF
DESIGNATION OF SPEAKING
ATTORNEY AT PLAN
CONFIRMATION HEARING**

- 17 ☐ Affects PG&E Corporation
18 ☐ Affects Pacific Gas and Electric
19 Company
20 ☒ Affects both Debtors.

[Related Dkt. Nos. 6320, 7037, 7182, and
7255]

Date: May 27, 2020
Time: 10:00 a.m.
Courtroom: 17

21 * All papers shall be filed in the Lead
22 Case No. 19-30088 DM.

23 **TO THE BANKRUPTCY COURT AND ALL PARTIES IN INTEREST:**

24 **PLEASE TAKE NOTICE** that, on May 15, 2020, ARB, Inc. ("ARB") timely filed
25 and served ARB, Inc. 's *Objection to Schedule of Executory Contracts and Unexpired Leases*
26 *to Be Assumed Pursuant to the Plan and Proposed Cure Amounts, and Reservation of Rights*
27 [Dkt. No. 7255] (the "Objection").

28 ///

1 **PLEASE TAKE FURTHER NOTICE** that, in accordance with the *Order*
2 *Establishing Confirmation Hearing Protocol* [Dkt. No. 7182], ARB hereby designates the
3 following attorney with respect to ARB's Objection and the Plan confirmation hearing:

4 Roger F. Friedman
5 RUTAN & TUCKER, LLP
6 rfriedman@rutan.com

7 **PLEASE TAKE FURTHER NOTICE** that, in reliance on the Debtors'
8 representations that they intend to present the Court with a Plan confirmation order to
9 provide procedures to address objections (including ARB's Objection) to the Debtors'
10 *Schedule of Executory Contracts and Unexpired Leases to Be Assumed Pursuant to the Plan*
11 *and Proposed Cure Amounts* [Dkt. No. 7037] subsequent to the Plan confirmation hearing,
12 and given the Court's statements that it will not consider these issues during the Plan
13 confirmation hearing, ARB has not designated any witnesses or exhibits for presentation at
14 the Plan confirmation hearing in connection with its Objection. ARB does not presently
15 intend to call any witnesses in connection with the Plan confirmation proceedings, but
16 reserves the right to call witnesses and present testimony and exhibits at a later date in
17 connection with any proceedings relating to assumption of executory contracts and cure
18 amounts. ARB files this Notice to preserve its right to be heard at the Plan confirmation
19 hearing in the event that any ground for objection raised in ARB's Objection, or any legal
20 issue impacting assumption of executory contracts or cure amounts relating to Plan
21 confirmation, is put at issue during the Plan confirmation proceedings.

22 **PLEASE TAKE FURTHER NOTICE** that the designation provided herein
23 remains subject to change upon further notice.

24 Dated: May 22, 2020

RUTAN & TUCKER, LLP
ROGER F. FRIEDMAN
PHILIP J. BLANCHARD
ASHLEY M. TEESDALE

27 By: /s/ Roger F. Friedman

28 Roger F. Friedman
Attorneys for Creditor ARB, INC.

1 **PROOF OF SERVICE**

2 (In re PG&E Corporation and Pacific Gas and Electric Company
3 USBC Case No. 19-30088)

4 **STATE OF CALIFORNIA, COUNTY OF ORANGE**

5 I am employed by the law office of Rutan & Tucker, LLP in the County of Orange,
6 State of California. I am over the age of 18 and not a party to the within action. My
7 business address is 611 Anton Boulevard, Suite 1400, Costa Mesa, California 92626-1931.
8 My electronic notification address is csolorzano@rutan.com.

9 On May 22, 2020, I served on the interested parties in said action the within:

10 **ARB, INC.'S NOTICE OF DESIGNATION OF SPEAKING ATTORNEY AT
11 CONFIRMATION HEARING**

12 as stated below:

- 13 ☒ (ELECTRONIC FILING) Pursuant to controlling General Orders and LBR, the
14 foregoing document will be served by the court via NEF and hyperlink to the
15 document on all parties requesting same.
- 16 ☒ (BY E-MAIL) by transmitting a true copy of the foregoing document(s) to the e-
17 mail addresses set forth on the attached service list.

18 I certify that I am employed in the office of a member of the bar of this Court at
19 whose direction the service was made.

20 Executed on May 22, 2020, at Costa Mesa, California.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 _____
23 Cecilia Solórzano

24 (Type or print name)

25 _____
26 /s/ Cecilia Solórzano

27 (Signature)

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